Alan

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

November 22, 1993

Mr. Phillip Backlund
Rockwell International Corp.
2135 West Maple Road
Troy, Michigan 48084

Dear Mr. Backlund:

I have reviewed your proposal for Phase I evaluations concerning the interim remedial action for the on-site landfill at the Randall-Textron location in Grenada, MS. Your proposal is generally acceptable, but the following questions and concerns need to be addressed:

1. What will be the estimated TCE and chromium concentrations in the released air?

2. How effective are the activated carbon filters at taking the TCE and chromium from the extracted air?

3. Will the activated carbon filters be considered a hazardous waste and how will they be handled?

4. The boundary of the landfill unit will be considered to be the ND limit of the soil isoconcentration map (Figure 4-1) for TCE and all treatment, handling, and movement of waste must take place within the "boundary" to avoid triggering LDR's and MTR's.

5. The Randall-Textron permit or Part A must be modified to include the new treatment unit before work can begin.

6. Are any liquids anticipated to accumulate in the impermeable liner of the lined cell and if liquids do accumulate how will they be handled?

7. Will the lifts of soil in the vapor extraction procedure be in 2 or 3 foot increments?

8. Further explanation of the flow direction being "reversed" in the pipes is needed for clarification. (p. 4-9)

OFFICE OF POLLUTION CONTROL, P. O. BOX 10385, JACKSON, MS 39289-0385, (601) 961-5171

We request that you respond to these issues in writing. Please contact me if there are any questions.

Sincerely,

Andrew S. Covington

Andrew S. Covington
Hazardous Waste Branch

ASC:gd

cc: Mr. Gary Martin, Eckenfelder Inc.
Mr. Larry Farmer, EPA

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

November 9, 1993

CERTIFIED MAIL NO. P 111 316 979

Mr. Steven A. Grover
Plant Manager
G. E. Plastics
P. O. Box 2520
Bay St. Louis, MS 39521-2520

Re: RCRA Compliance Inspection
of September 15, 1993

Dear Mr. Grover:

During the RCRA Compliance Inspection on September 15, 1993, it was observed that approximately twenty (20) drums in the permitted storage area had labels that were faded so as to be unreadable. Although the labels were immediately replaced with new ones, G. E. Plastics should be aware that MHWMR 268.50(a)(2)(i) requires that each container be clearly marked to identify its contents and the date that accumulation began. Our interpretation of this regulation is that each drum must have a label containing the required information, and that a code or tracking number alone is not sufficient to meet the regulatory requirements.

Please advise us of the actions you have taken to insure compliance with the labeling requirements of MHWMR 268.50. Your written response should be submitted on or before November 24, 1993.

The last three (3) inspections at the facility have noted at least some problem in the container storage area. The RCRA Penalty Policy could be interpreted such that the company is a repeat violator and subject to mandatory penalties. Therefore, I must impress the importance of assuring that the container storage area is operated in accordance with all regulatory requirements in the future.

If you have any questions, please contact Chip Rogers of my staff at (601) 961-5368.

Sincerely,

Jerry B. Banks, P.E.
Chief, RCRA Section

JBB:gd

7-1-93
NO CPA REPORT
CES

TEXTRON

Textron Inc.

40 Westminster Street
Providence, R.I. 02903
401/421-2800

March 30, 1993

VIA OVERNIGHT COURIER
Executive Director
Mississippi Department of Environmental Quality
2380 Highway 80 West
Jackson, MS 39204

Re: **Financial Responsibility Requirements for Closure and Post-closure of Treatment Storage and Disposal Facilities**

Dear Sir or Madam:

Textron Inc., a diversified manufacturing, aerospace and financial services company located in Providence, Rhode Island, with a manufacturing facility in Mississippi, is subject to Mississippi regulations applicable to owners and operators of Hazardous Waste Treatment, Storage and Disposal Facilities.

In compliance with MHWMR Part 265, as respects closure and post-closure inflation adjusted cost estimates and updated financial information, respectively, Textron encloses the following:

1. A letter dated April 1, 1993 from the Chief Financial Officer of Textron Inc. as specified in the aforenoted;

2. A copy of the 1992 Annual Report of Textron Inc. containing a report by Ernst & Young on Textron's financial statements for the fiscal year ended January 2, 1993; and

3. A letter dated April 1, 1993 from Ernst & Young which verifies the financial information contained in the letter referred to in Paragraph 1 above.

Please do not hesitate to call me should you have any questions or concerns with respect to any of the above. My direct line is (401) 457-2215.

Sincerely,

Patricia A. Iezzi
Supervisor Environmental Programs

PAI/kc
DNRLTRS
Enclosures

cc: Mark Williams - Randall
Ellen Kaloostian - Ernst & Young
(w/enclosures)

TEXTRON

Textron Inc.

40 Westminster Street
Providence, R.I. 02903
401/421-2800

April 1, 1993

Executive Director
Mississippi Department of Environmental Quality
2380 Highway 80 West
Jackson, MS 39204

RE: Updated Financial Assurance Requirements Demonstrating Financial Responsibility for Liability Coverage and Closure and Post-Closure Care

Dear Sir or Madam:

I am the Chief Financial Officer of Textron Inc., 40 Westminster Street, Providence, Rhode Island 02903. This letter is in support of the use of the financial test to demonstrate financial responsibility for liability coverage and closure and/or post-closure care as specified in Subpart H of MHWMR Parts 264 and 265.

The firm identified above is the owner or operator of the following facilities for which liability coverage for both sudden and non-sudden accidental occurrences is being demonstrated through the financial test specified in Subpart H of MHWMR Parts 264 and 265.

Randall Division of Textron Inc., Grenada Highway #332 East Rt. 2, Grenada,MS 38901 - EPA #MSD007037278.

The firm identified above guarantees, through the corporate guarantee specified in Subpart H of MHWMR Parts 264 and 265, liability coverage for both sudden and non-sudden accidental occurrences at the following facilities owned or operated by the following subsidiaries of the firm: None

1. The firm identified above owns or operates the following facilities which are in the State of Mississippi for which financial assurance for closure and/or post-closure care is demonstrated through the financial test specified in Subpart H of MHWMR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by the test are shown for each facility.

Randall Division of Textron Inc., Grenada Highway #332 East Rt. 2, Grenada, MS 38901 - EPA #MSD007037278. Closure - $ 1,291,249.

2. The firm identified above guarantees, through the corporate guarantee specified in Subpart H of MHWMR Parts 264 and 265, the closure and post-closure care of the following facilities which are located in the State of Mississippi owned or operated by its subsidiaries. The current cost estimates for the closure or post-closure care so guaranteed are shown for each facility: None

3. In states where EPA is not administering the financial requirements of Subpart H of MHWMR Parts 264 and 265, this firm is demonstrating financial assurance for the closure or post-closure care of the following facilities through the use of a test equivalent or substantially equivalent to the financial test specified in Subpart H of MHWMR Parts 264 and 265. The current closure and/or post-closure cost estimates covered by such a test or guarantee are shown for each facility: See attached Exhibit A

4. The firm identified above owns or operates the following hazardous waste management facilities for which financial assurance for closure, or if a disposal facility, for post-closure care, is not demonstrated either to EPA or a State through the financial test or any other financial assurance mechanism specified in Subpart H of MHWMR Parts 264 and 265, or equivalent or substantially equivalent State mechanisms. The current closure and/or post-closure cost estimates not covered by such financial assurance are shown for each facility: None

5. This firm is the owner or operator of the following UIC facilities for which financial assurance for plugging and abandonment is required under Part 144. The current closure cost estimates as required by 40 CFR 144.62 are shown for each facility: None

The firm is required to file a Form 10K with the Securities and Exchange Commission (SEC) for the latest fiscal year.

The fiscal year of this firm ends on the Saturday nearest to the thirty-first day of December in each year, whether such Saturday falls in December or in January. The figures for the following items marked with an asterisk are derived from this firm's independently audited, year-end financial statements and footnotes for the latest completed fiscal year, ended January 2, 1993.

ALTERNATIVE II

1.	Sum of current closure and post-closure cost estimates (total of all cost estimates listed above)	$ 9,581,192
2.	Amount of annual aggregate liability coverage to be demonstrated	$ 8,000,000
3.	Sum of lines 1 and 2	$ 17,581,192
4.	Current bond rating of most recent issuance and name of rating service	A3 - Moody's
5.	Date of issuance of bond	February 5, 1989
6.	Date of maturity of bond	February 5, 1995
*7.	Tangible net worth (if any portion of the closure or post-closure cost estimates is included in "total liabilities" on your financial statements you may add that portion to this line)	$1,069,100,000.
*8.	Total assets in the U.S. (required only if less than 90% of assets are located in U.S.)	$15,842,000,000.

		YES	NO
9.	Is line 7 at least $10 million?	X	
10.	Is line 7 at least 6 times line 3?	X	
*11.	Are at least 90% of assets located in the U.S.? If not, complete line 12		X
12.	Is line 8 at least 6 times line 3?	X	

I hereby certify that the wording of this letter is identical to the wording specified in MHWMR Section 264.151(g), as such regulations were constituted on the date shown immediately below.

TEXTRON INC

By: _____

Richard A. McWhirter
Executive Vice President
and Chief Financial
Officer

Dated: 3/31/93

Exhibit A

	Location	EPA #	Closure Costs	Post Closure Costs
Bell* Aerospace	2221 Niagara Falls Blvd. Wheatfield NY 14304	NYD002106276	$ -0-	$ 5,975,065
E-Z-Go	Marvin Griffin Road Augusta, GA 30913	GAD003302064	$ 129,038	$ -0-
Homelite	Little Mountain Road Gastonia, NC 28052	NCDO91249417	$ -0-	$ 1,668,030
Bell Helicopter	600 E. Hurst Blvd. Hurst, TX 76053	TXD980626006	$ 517,810	$ -0-

* Currently known as Textron Defense Systems

RANDALL.RFT/FPAI.DL2

ERNST & YOUNG

277 Park Avenue
New York, New York 10172

Phone: 212 773 3000

REPORT OF INDEPENDENT AUDITORS

The Board of Directors
Textron Inc.

We have audited, in accordance with generally accepted auditing standards, the consolidated balance sheet of Textron Inc. as of January 2, 1993 and the related consolidated statements of income, cash flows and changes in shareholders' equity for the year then ended and have issued our report thereon dated February 4, 1993.

At your request, we have read the letter dated April 1, 1993 from Richard A. McWhirter, Executive Vice President and Chief Financial Officer of Textron Inc. in support of the use of the financial test, as specified in Subpart H of MHWMR Parts 264 and 265, to demonstrate financial responsibility for liability coverage and closure and/or post-closure care of the Corporation's hazardous waste facilities at the locations listed in the letter.

In connection with Subpart H of MHWMR Parts 264 and 265, we have compared amounts included in the audited consolidated financial statements of Textron Inc. for the year ended January 2, 1993, the latest fiscal year, to the data in the letter indicated as being derived from such audited financial statements. In connection with this comparison, no matters came to our attention that caused us to believe that the data indicated as being derived from the audited financial statements should be adjusted.

This report is intended solely to assist you in complying with the reporting requirements associated with the financial test, as specified in Subpart H of MHWMR Parts 264 and 265, to demonstrate financial responsibility for liability coverage and closure and/or post-closure care and should not be used for any other purpose.

Ernst + Young

April 1, 1993

RCRA Inspection Report

1) Inspector and Author of Report

Dann J. Spariosu
Environmental Scientist
U.S. Environmental Protection Agency, Region IV

2) Facility Information

Randall-Textron
Highway 332 East
Grenada, Mississippi 38901
MSD 007 037 278

3) Responsible Company Official

Ms. Rhonda York

4) Inspection Participants

Dann J. Spariosu, USEPA (RCRA)
Bruce Ferguson, Mississippi Department of Environmental Quality (MSDEQ)
Rhonda York, Randall-Textron (RT)

5) Date and Time of Inspection

July 28, 1993, 0845 CST

6) Applicable Regulations

Mississippi Hazardous Waste Management Regulations, cited herein as MHWMR 260-270. Mississippi is not yet authorized to enforce, in lieu of EPA, provisions of the Hazardous and Solid Waste Amendments (HSWA).

7) Purpose of Inspection

The purpose of the MSDEQ lead inspection was to assess the compliance of the facility with regulations promulgated under the Resource Conservation and Recovery Act. EPA was present for a State oversight inspection, to evaluate the Mississippi RCRA compliance inspection program.

8) Facility Description and Background

Randall-Textron manufactures wheel covers for the automotive industry. Manufacturing activities include parts stamping, rolling, washing, polishing, and electroplating. The plant was constructed in 1960 by Lyons, Inc., purchased by North American Rockwell in 1966, and Randall-Textron in 1985.

A chromium bearing, F006 listed hazardous waste is generated by the electroplating process in the form of a wastewater (also D007). Prior to July, 1990, the wastewater was sent to a chromium reduction unit where Cr^{+6} is reduced to Cr^{+3}, from there to a 525' x 225' x 10' deep equalization lagoon, then to a wastewater clarifier, and finally discharged to an unnamed creek under an NPDES permit. In 1990, RT realized that it was operating an illegal land disposal unit, ceased putting hazardous waste into it, and notified MSDEQ. A closure plan has been submitted as part of the requirements of a subsequent Agreed Order entered into by RT and the Mississippi Commission on Environmental Quality. The wastewater now bypasses the lagoon and is equalized in a tank adjacent to the clarifier. A sludge is generated at the clarifier and pumped into the "sludge pond". This waste was delisted by MSDEQ in 1982.

Paint booth vent air filters become contaminated with chromium and are managed as D007. Other wastes generated in the past include F001 trichloroethylene (paint solvent), D001 petroleum naphtha (parts washers), D001 toluene (paint thinner), and F002, F008, D007 methylene chloride (paint stripper). D001 waste mineral spirits are generated intermittently during cleaning operations. These wastes have been drummed and shipped to permitted TSD facilities, fuel blenders, or recyclers. Spent caustic and acid used in the plating process are neutralized in the wastewater treatment process, never comprising RCRA hazardous wastes. The Randall-Textron electroplating process does not use cyanide.

RT is currently operating under interim status while closure of the drained surface impoundment and remedial facility investigations proceed. No other RCRA regulated units exist; containerized hazardous waste is shipped in less-than-90-days. Groundwater studies have revealed the presence of three centers of concentration of contaminants in the subsurface, two of chromium and one consisting primarily of organic NAPLS. Complicating matters is a groundwater divide running through the property. Rockwell International has begun investigation and remediation of contamination emanating from an old landfill used when it owned the facility. This action is under the purview of MSDEQ's Uncontrolled Sites Branch (CERCLA), however, MSDEQ is currently negotiating with Rockwell, Eckenfelder, and Randall-Textron and intends to regulate the corrective action entirely under one RCRA permit.

9) Findings

The plant was not in full operation on the day of the inspection, and has operated, this year, on reduced schedules due to a lack of contracts from the automotive industry. Nonetheless, management, environmental staff, and maintenance personnel were working, so we were able to conduct a full RCRA inspection.

We began the inspection with a review of Randall-Textron's records related to hazardous waste management. We looked at training records, waste analysis plan, contingency plan, hazardous waste manifests, land ban notifications, operating records, facility inspection logs, and waste minimization plans. All of the records were present and in good order. Daily and weekly inspection logs for the weeks of June 24 to July 6, 1993, were missing; however, the plant was shut down during that period and not managing any hazardous waste. Records pertaining to TSCA, EPCRA, FIFRA, CWA, and CAA were also examined for the purpose of completing the Multimedia Screening Checklist. All were in order and kept in the environmental management files. The process was eased because the facility completes an annual environmental management report for its parent company, Textron.

Randall-Textron maintains a written Waste Minimization Plan at the facility and signs waste minimization statements on each of its manifests. Although the plan is a fairly general statement required by Textron, RT's efforts at source reduction are evidenced by the operating records and annual generator reports. Randall-Textron has reduced its generation of trichloroethylene based hazardous waste from about 14000 lbs in 1990 to 0 last year. The chemical has been replaced by a non-hazardous solvent in painting operations. Safety-Kleen parts washer solvents have also been replaced by non-hazardous materials. RT has commendably eliminated two hazardous waste streams.

We next conducted a visual site inspection. We looked at the equalization lagoon, some of the groundwater monitoring wells, the wastewater treatment system, and the NPDES discharge point. Following this, we were shown the temporary hazardous waste storage pad and given a tour of the manufacturing plant and laboratory.

The facility is securely fenced and protected by locked gates and a security guard at the main entrance. The plant was very clean compared to other electroplating operations we have observed. Signs posted around the plant and procedures followed by the employees give the impression that safety is a major concern of the company. Aisle space, inside and out, was wide and kept free of obstructions. Hydraulically operated stamping units were surrounded by curbs to capture leaking oils and were all fairly clean to the extent inspected.

The equalization lagoon had a small area of standing water near one end (Photo 1,2). Although there had not been much rainfall in the area, the terrain surrounding the plant is very marshy. The sludge/soil forming the lagoon bottom appears darker than surrounding soils. There were no warning signs or fences around the lagoon itself, however, general plant security limits access to authorized personnel. Groundwater monitoring wells surrounding the lagoon and in other locations were in good condition, fitted with locked covers, and protected by bumper guard posts (Photo 3,4).

The wastewater treatment neutralization tank and clarifier are across the highway from the plant in a separate enclosure. Although there was a small amount of lime on the ground around the neutralization tank, the clarifier area was clean and free of any signs of sludge or float spillage. The NPDES discharge water was only trickling out on the inspection day, but appeared to be clean and clear, as did the creek downstream from the discharge.

Between the wastewater treatment and the NPDES discharge, we found approximately 100 x 55 gallon drums in a cleared, grassy area (Photo 5). Ms. York informed us that these drums contained well-cuttings from the soil/groundwater investi[illegible] conducted by Eckenfelder, Inc. as the contractor for the Rockwell led ren project. As far as she knew, no RCRA hazardous waste determination ha made on the material by Eckenfelder. The drums were sealed and in good Those that we could closely inspect were labeled (Photo 6) to indicate that t cuttings, none, however, were dated. According to Ms. York, they have be for 5-6 months. There was insufficient aisle space allowed to inspect all dru this report is being written, we have received word that Eckenfelder has enga ChemWaste Management to come and profile the drill cuttings in early Septem

The less-than-90-day container storage exceeds all requirements for generator waste storage and also all requirements applicable to permitted storage units (Photo 7). The waste containers sit on a concrete pad with secondary containment curbing. The pad is surrounded by a locked fence and is also roofed. There were seven drums on the pad on the day of the inspection, of which five contained hazardous waste. Of the five, three were labeled D007, one was "waste toluene" and the other "waste urethane". All were marked with accumulation dates well within the ninety day storage limit. Another drum contained non-hazardous waste, while the last held a spill control kit. Fire extinguishers and warning signs were highly visible. Because waste is collected during intermittent batch generation (tank emptying, cleaning), there are no continuous satellite accumulation areas at the facility.

10) Violations

a) Randall-Textron was found to be in violation of the following Mississippi Hazardous Waste Management Regulation:

265.14(c) requires that signs with the legend "Danger-Unauthorized Personnel Keep Out" be posted at all approaches to the active portion of a facility. Randall-Textron had no such signs around the surface impoundment (equalization lagoon).

This violation is mitigated somewhat by the general security at the facility which make it unlikely that unauthorized persons would be on the facility grounds. Nonetheless, the fact that concentrations of chromium in the lagoon sludge/soil have been found at hazardous levels removes any exemption from MHWMR 265.14(c).

b) Rockwell International has violated **MHWMR 262.11** by not performing a waste determination on the drummed drill cuttings within 90 days of generation. Should the waste be determined to be hazardous waste, Rockwell International would also have violated **MHWMR 262.12(a)** which requires generators who store hazardous waste to obtain an EPA Identification number, along with several other generator standards contained in **MHWMR Part 262.**

12) Signed

Dann J. Sparioso
Dann J. Sparioso
Inspector

Sept 1, 1993
Date

13) Concurrence

Shannon Maher
Shannon E. Maher
Chief, AL/MS Unit

Sept. 2, 1993
Date

Approval

John E. Dickinson
John E. Dickinson, P.E.
Chef, RCRA Compliance Section

9/23/93
Date

PHOTOGRAPHS

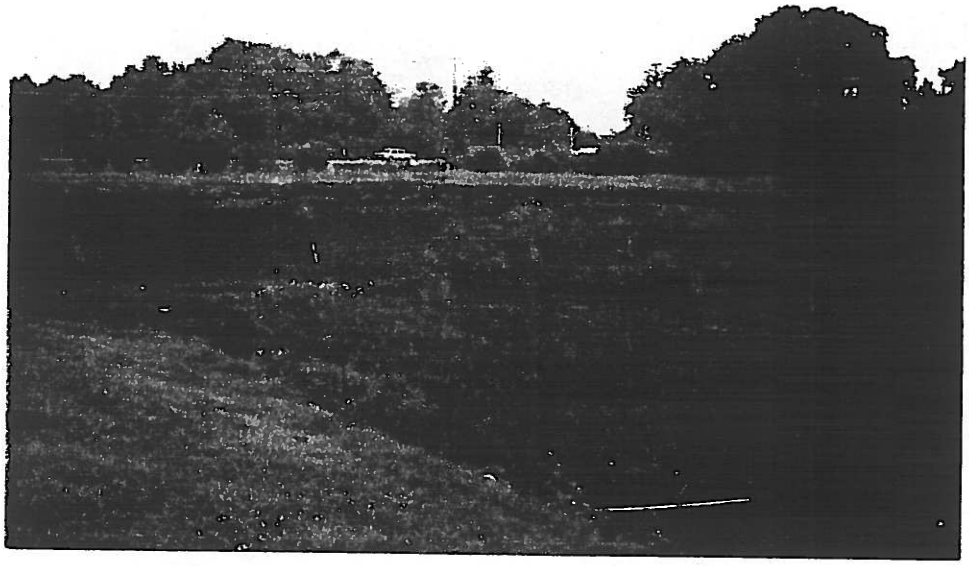


Photo 1. Equalization lagoon, facing northwest.

Photo 2. Equalization lagoon, facing southeast.

6.0 PART B POST-CLOSURE APPLICATION

In accordance with applicable regulations, including 40 CFR, Part 270, Randall will be required to obtain a RCRA post-closure permit. This permit will require consideration of groundwater monitoring, unsaturated zone monitoring, corrective action, and post-closure care. As such, a Part B permit application will be prepared to outline applicable information concerning post-closure activities and to summarize the closure operations. Other applicable considerations, such as groundwater monitoring, surface water floodplains, and corrective action will require input from Randall, given the potential involvement of the previous facility owner.

The information required for the Part B application will be in part satisfied by development of the data necessary to certify closure in accordance with 40 CFR, Part 264 requirements, as outlined within Section 6.0.

APPENDIX A - FIGURES

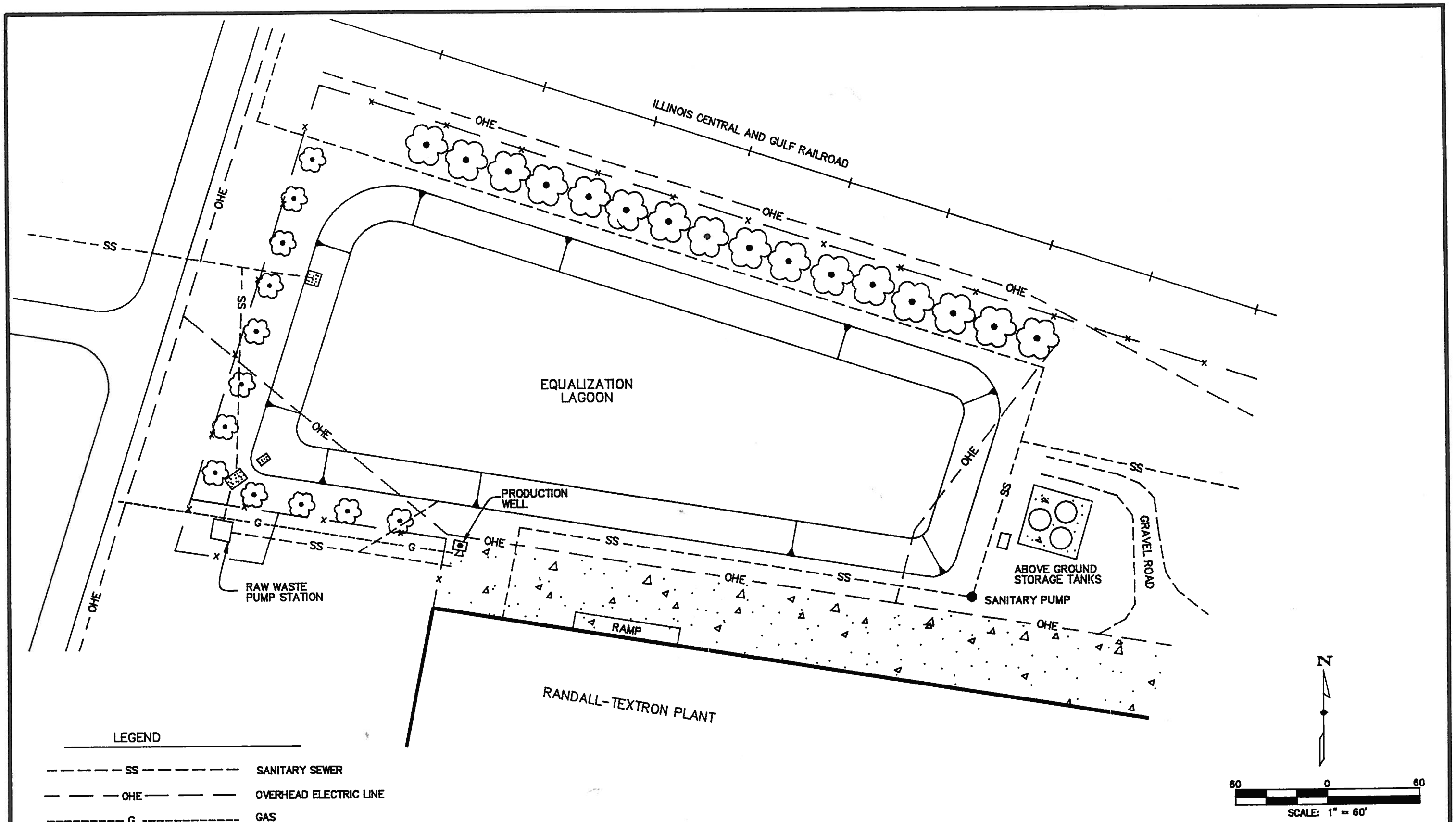


Figure 1 *Plan View*	Lagoon Closure Randall-Textron Grenada, Mississippi

SEACOR 355 Union Boulevard Suite 200 Lakewood, Colorado 80228	DWN SLG APPR DWE DATE 9-22-93 JOB NO. R0010-001-001

Farmer
Rev. W.
Jason

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

December 8, 1993

Legal Notice
The Daily Sentinel-Star
P. O. Box 907
Grenada, MS 38901

Randall Textron - MSD 007 037 278

Dear Sir:

Enclosed herewith is a legal notice to be published in your newspaper on December 23, 1993.

Please furnish this office with statement and proof of publication in duplicate.

Very truly yours,

Andrew S. Covington
Hazardous Waste Division

ASC:gd
Enclosure
cc: Ms. Terry Bailey, OPC
cc: Alan ~~Terry~~ Farmer, EPA

WASTE MANAGEMENT DIVISION
Jan 6 6 10 PM '94
T.O.

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

December 8, 1993

Legal Notice
The Clarion-Ledger
P. O. Box 40
Jackson, MS 39205

Dear Sir:

Enclosed herewith is a legal notice to be published in your newspaper on December 23, 1993.

Please furnish this office with statement and proof of publication in duplicate.

Very truly yours,

Andrew S. Covington
Hazardous Waste Division

ASC:gd
Enclosure
cc: Ms. Terry Bailey, OPC

PUBLIC NOTICE
Mississippi Environmental Quality Permit Board
P.O. Box 10385
Jackson, Mississippi 39289-0385
(601) 961-5171

PUBLIC NOTICE NO. HW-93-004
NOTICE OF PROPOSED MODIFIED CLOSURE PLAN APPROVAL UNDER THE RESOURCE CONSERVATION AND RECOVERY ACT (RCRA) AND THE MISSISSIPPI SOLID WASTE DISPOSAL ACT TO RANDALL TEXTRON, HWY. 332 EAST, ROUTE 5, BOX 3, GRENADA, MISSISSIPPI, 38901.

Randall Textron, ID Number MSD007037278, has applied to the Mississippi Environmental Quality Permit Board for a modification to their closure plan. The original closure plan was unanimously approved by the Permit Board on April 27, 1993. The modification plan would close their equalization basin, which was part of the facility's wastewater treatment system, into a smaller area than the original plan. Sludges in the basin have been determined to be F006, wastewater sludges from electroplating processes, and D007, toxicity characteristic for chromium, hazardous wastes. The basin was taken out of service in September of 1991. The facility is located at Hwy. 332 East, Route 5, Box 3, Grenada, Mississippi 38901.

The staff of the Permit Board believes that, with proper constraints and limitations specified within the proposed modified closure plan, this project will operate within all State and Federal hazardous waste laws and standards and will protect health and the environment. Therefore, the staff of the Permit Board has preliminarily decided, based upon available information, to recommend to the Board that the modified closure plan be approved. However, before proceeding further, public comments are being solicited. The staff recommendation to the Board, as well as the Board's decision, will be made only after a thorough consideration of all public comments.

Persons wishing to comment upon or object to the proposed determination are invited to submit comments in writing to Andrew S. Covington at the above Permit Board address, no later January 23, 1994. All comments received prior to that day will be considered in the formulation of final determinations regarding the application. A hearing will not be held on this permit action, unless specifically requested in writing by the commenter.

Additional details about the application, including a copy of the closure plan with a charge for copying, are available by writing or calling at the above Permit Board address and telephone number. This information is also available for review at the following location during normal business hours:

Mississippi Department of Environmental Quality
Office of Pollution Control
Southport Center Building
2380 Highway 80 West
Jackson, Mississippi 39204

Please bring the foregoing to the attention of persons whom you know will be interested.

Jason

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

September 13, 1993

Mr. Mark Williams
Randall-Textron
10179 Commerce Park Dr.
Cincinnati, Ohio 45246

RE: Extension to Modification Proposal

Dear Mr. Williams:

I have reviewed your letter of August 25, 1993, addressed to Bruce Ferguson of this office, and we feel an additional 30 days to complete the modification to the proposal to close your waste cell is acceptable. If I can be of any further assistance I can be reached at (601) 961-5305.

Sincerely,

Andrew S. Covington

Andrew S. Covington
Hazardous Waste Division

ASC:gd

cc: Mr. G. Alan Farmer, EPA

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

June 1, 1993

Mr. G. Alan Farmer, Chief RCRA Branch
Waste Management Division
US EPA
345 Courtland St., NE
Atlanta, Georgia 30365

Re: Corrective Action Management Units

Dear Mr. Farmer:

The State of Mississippi has an interim status RCRA facility, Randall Textron, which would like to take advantage of the new CAMU rule. The facility, is a non-notifier and is presently under order to close a surface impoundment which is approximately 250 feet by 500 feet. Utilization of the CAMU approach could allow for better stabilization techniques and reduce the area in which the wastes are contained.

It is my understanding that the CAMU approach would have to be implemented under a 3008(h) order since Randall-Textron is an interim status facility. Since EPA does not recognize State Orders as equivalent to 3008(h) orders, it appears that to utilize the CAMU rule the facility must work through EPA. The State of Mississippi would like to take the most expeditious route in the closing of the unit. If it is agreeable that a State Order would result in a more timely closing, we would like to handle the CAMU rule under a State Order. If not we would like same guidance as to the most expeditious approach.

Your help in this matter is greatly appreciated. I look forward to hearing from you.

Sincerely,

Jerry B. Banks, P.E.
Chief, RCRA Section

JBB:gd

STATE OF MISSISSIPPI

DEPARTMENT OF ENVIRONMENTAL QUALITY

JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

October 5, 1993

Mr. Mark Williams
Randall Textron
10179 Commerce Park Drive
Cincinnati, Ohio 45246

Re: Modification of Equalization Lagoon Closure Plan, Randall Textron - Grenada, MS

Mr. Williams:

The Mississippi Office of Pollution Control (Office) has reviewed the above referenced plan. The Office has concluded that the plan is satisfactory with the exceptions shown below.

1) The 24" low-permeability layer below the synthetic liner appears to have been ommitted. Please include this layer in the figures and discussion, and also include information on how this layer will be tested to prove it has 1 x 10-7 cm/sec permeability or less. Additionally, it will be necessary to state how the lifts will be compacted.

2) The Office does not consider the proposed hydraulic conductivity of 4.91 x 10-4 for the drainage layer to be acceptable. The Technical Guidance Document for Final Covers (EPA/530-SW-89-047, July 1989) gives no allowance for less than 1 x 10-2 cm/sec in a climate or under the conditions found at this site.

3) In Figure 4 the drainage layer doesn't appear to drain into the liner anchor trench. It should be constructed so that the drainage layer does drain directly into this trench for maximum effectiveness of the drainage system.

4) It is unclear from the figures where and how the liner anchor trench drains.

5) It appears from the figures that the east area of the lagoon will not have drainage out of the area. This would create a "pond" of the east area of the lagoon.

6) The sampling of the east area should include the analysis listed in MHWMR 261 Appendix VIII and 264 Appendix IX.

7) A detailed construction quality assurance (CQA) plan should be part of the proposal.

8) There was no mention of sampling or testing the soil in the west side of the lagoon after the waste had been moved to the east side (before the liner is placed).

9) The proposal should mention that while the liquid sludges are being pumped from the west side to the east side they will not leave the boundary of the unit.

The Office request that you or your representative meet with us within the next 10 days in order for these exceptions to be addressed so that we may proceed as soon as possible with this project. Please contact Bruce Ferguson or me to schedule a convenient time and date for this meeting.

Sincerely,

Andrew S. Covington

Andrew S. Covington
Hazardous Waste Division

ASC:ac
cc: Mr. G. Alan Farmer, EPA

ECKENFELDER INC.®

November 4, 1993 9124

Mr. Jason Garby
U.S. Environmental Protection Agency
Region IV
345 Courtland Street, NE
Atlanta, GA 30365

RE: Randall Textron Site
Grenada, Mississippi

Dear Mr. Garby:

At the request of Mr. Andrew Covington with the Mississippi Department of Environmental Quality (MDEQ) we are transmitting one copy of the Phase 1-Final Report on Soil Interim Remedial Action for the subject site.

Please call at your convenience if you have any questions or if we can be of further assistance.

Sincerely,

ECKENFELDER INC.®

Gary W. Martin, P.E., CHMM
Senior Manager
Waste Management Division

cc: Phil Backlund
Jeffrey L. Pintenich, P.E., CHMM

Q:\9124\L1104.DOC

227 French Landing Drive
Nashville, Tennessee 37228
615.255.2288
FAX 615.256.8332

RANDALL TEXTRON

Randall Division of Textron Inc.
10179 Commerce Park Drive
Cincinnati, Ohio 45246
513/896-9400

June 9, 1993

Mr. Bruce Ferguson
State of Mississippi
Department of Environmental Quality
Office of Pollution Control
P.O. Box 10385
Jackson, MS 39389-0385

Subject: Request for Modification
Equalization Lagoon Closure Plan
Randall Textron
Grenada, Mississippi

Dear Mr. Ferguson:

This letter follows up on our recent discussions and requests a modification of Randall Textron's closure plan for the equalization lagoon at Randall's Grenada, Mississippi facility. As discussed below, however, some of Randall's proposed modifications are contingent on the resolution of certain regulatory issues. Randall requests expedited resolution of these issues before Department approval of the revised closure plan.

As you know, Randall submitted a closure plan for the equalization lagoon and was awaiting approval of the closure plan, when the U.S. Environmental Protection Agency issued its new Corrective Action Management Unit (CAMU) rule on February 16, 1993 (58 Fed. Reg. 8658). Following discussions with your office, Randall sent you a letter dated May 12, 1993, requesting an opportunity to modify the closure plan in order to take advantage of the CAMU rule. Based on our review of the CAMU rule, however, it is unclear how the new rule would apply to Randall's proposed modifications, or indeed, whether it would apply at all. It is also unclear whether other regulatory issues may be raised by the modified closure plan being considered.

In order to expedite review of these issues and approval of Randall's closure plan, this letter outlines the proposed modifications and seeks the Department's guidance on their regulatory feasibility. We would appreciate your review of the proposed modifications so that we can develop a consensus and proceed with the closure program.

SUMMARY OF APPROACH

Based on the comments received from the Mississippi Office of Pollution Control on the Equalization Lagoon Closure and Post-Closure Plan, Randall requested prospective contractors to develop proposals for closure. These proposals are presently being developed to provide for stabilization of waste within the lagoon and construction of a cap above the entire lagoon, as outlined in the original closure plan. Discussions with potential contractors, however, have indicated that a number of potential benefits might be achieved by modifying some elements of the original approach.

The first set of proposed modifications relates to the waste stabilization process. A new stabilization agent (pelletized quicklime) has been identified as more appropriate than cement. In addition, stabilization in-place is complicated by the fact that the bottom of the lagoon at the northwest end may intercept the groundwater surface. This was noted previously as the reason for requiring closure in-place. In order to facilitate the stabilization process and to limit potential contact of the waste with groundwater, Randall believes it would be appropriate to place a layer of soil beneath the impoundment to an elevation above the level of seasonal influences. Placement of a layer of soil beneath the stabilized sludge would necessitate movement of sludge within the impoundment prior to stabilization. This movement of sludge would enhance mixing of the waste with the stabilization agent and increase homogeneity within stabilized waste.

The second set of proposed modifications relates to the size and function of the closed waste unit. The degree of environmental protection provided by stabilizing the waste in-place and capping the entire waste unit is adequate, since no leachable characteristics have been identified through previous analyses. While leachability of the waste is not anticipated, however, there could be benefits from further isolating the stabilized waste from the groundwater. Therefore, if it is determined to be consistent with regulatory requirements, Randall proposes to construct a cell with a flexible polyethylene membrane on less than one-half

of the current waste unit and to cap the cell. The remaining (uncapped) portion of the current waste unit would be filled with soil of sufficient thickness to support revegetation. This approach would provide greater waste isolation, would minimize the land area exposed to the waste, and would reduce future maintenance requirements. If this approach is regulatorily feasible, it would best meet the intent of EPA guidance to provide an effective, permanent impoundment closure.

REVISED CLOSURE APPROACH

Based on the considerations in the previous section, and following discussions with prospective contractors, a modified closure approach has been developed. The modified closure activities are summarized in the following paragraphs, while details of the lagoon configuration following closure are shown on Figures 1, 2, and 3.

Sludge Stabilization - Sludges were originally planned for stabilization using cement. However, because of potential fugitive dust emissions during incorporation into the waste, a pelletized quicklime has been identified as a more appropriate stabilization agent. The use of quicklime would not provide the same degree of chemically deceived compressive strength, but would meet relevant criteria for limiting settlement of the cap. Accordingly, settlement would be limited by physical densification using conventional compaction methodologies. The density of the resulting compacted mass would be correlated to an estimate of potential settlement using geotechnical laboratory analyses.

Lagoon Bottom Modification - The depth of the lagoon within the northwest end may exceed the depth to groundwater as noted previously. Therefore, a protective layer of soils would be installed over the base of the lagoon as necessary to eliminate potential contact between groundwater and the stabilized waste, as shown schematically on Figure 1.

To place soils within the bottom of the lagoon, it would be necessary to first move the sludges from within the area requiring the addition of soil. Removal of these sludges would be performed down to the waste/soil contact. To ensure that sludges are adequately removed, careful inspection of the pond bottom would be performed and would be coupled with sampling and characterization of the soils characteristics (i.e. sand. clay, etc.).

Once wastes are removed from the pond bottom, and appropriate samples have been obtained, a layer of sandy soils would be installed. These soils would be cohesionless in nature to provide the greatest degree of stability within the bottom of the lagoon. This material would then be leveled and compacted to provide a surface acceptable for the installation of a liner.

Cell Construction - Once the pond bottom soils have been placed and compacted, a retention berm would be constructed as shown on Figures 1 and 2. Following construction of the berm, the resulting cell would be lined with a flexible polyethylene membrane. This membrane would be anchored around the perimeter of the cell to provide permanent containment. The lining material would be placed, seamed, and inspected using a defined QA/QC protocol.

Waste Placement - After installation of the cell lining, the stabilized waste would be trans-loaded from the unlined area of the cell to the lined area using a hydraulic excavator. Once a sufficient cover of waste has been placed, a bulldozer would be used to place waste within the lined cells in lifts. Each of these lifts would then be compacted to a sufficient degree to ensure that settlement would not impact the function or integrity of the cap. Samples of the compacted waste would be obtained to determine the geotechnical properties for settlement estimates.

Wastes would be removed from the unlined cell until the original soils beneath the impoundment are exposed. The extent of removal would be determined by establishing surveyed ground control points.

Cap Construction - Following placement and compaction of the final lift of waste, the exposed surface would be

graded to facilitate placement of soils for the cap. The cap would then be constructed in accordance with the requirements described in the closure plan.

Because of the addition of the bottom liner, a polyethylene membrane liner would be added in the cap. This liner would be placed between the drainage layer and above the lower liner component. With the addition of the liner membrane, it is proposed that the underlying soil component is reduced to a thickness of one foot.

Final grading of the cap would provide for positive drainage to the perimeter drainage ditches shown on Figure 2. The final surface would have slopes of at least 3 percent, but no more then 5 percent, as shown in Figure 3.

Within the uncapped area of the lagoon, fill materials would be used that are capable of supporting a vegetative cover. The thickness of these soils would be sufficient to vegetative development and allow infiltration so that ponding does not occur.

Drainage System - An integral part of the final cap would be development of a defined surface water drainage network. This network would be comprised of drainage ditches and run-on control berms as shown on Figure 2. In general, the surface water collected, would be discharged to natural drainage in the ditch which runs between the lagoon and the railroad tracks. The configuration of the ditches would be developed based upon final elevations of the cap and the existing ditch profile.

As shown on Figures 1 and 2, the proposed approach would leave a slight depression within the uncapped area. Surface water would be routed away from this depression using the network of diversion ditches and run-on control berms. This would limit surface water accumulation to that represented by direct precipitation. Therefore, evapotranspiration and infiltration into the subsurface soils should be sufficient to limit potential ponding of free water.

Revegetation - Following final grading of the cap and the adjacent uncapped area, the entire disturbed area will be revegetated with native grasses and legumes. The revegetation mixture will then be selected in concert with the local Soil Conservation Service office and will be developed to provide resistance to erosion with minimal maintenance.

CONCLUSION

Randall seeks guidance on whether its proposed modifications to its closure plan are consistent with regulatory requirements. If so, Randall seeks approval of the outlined approach as a modification of the current Closure and Post-Closure Plan. Approval on this basis would allow implementation without the need for additional public comment, and would thus facilitate our ability to take advantage of weather conditions.

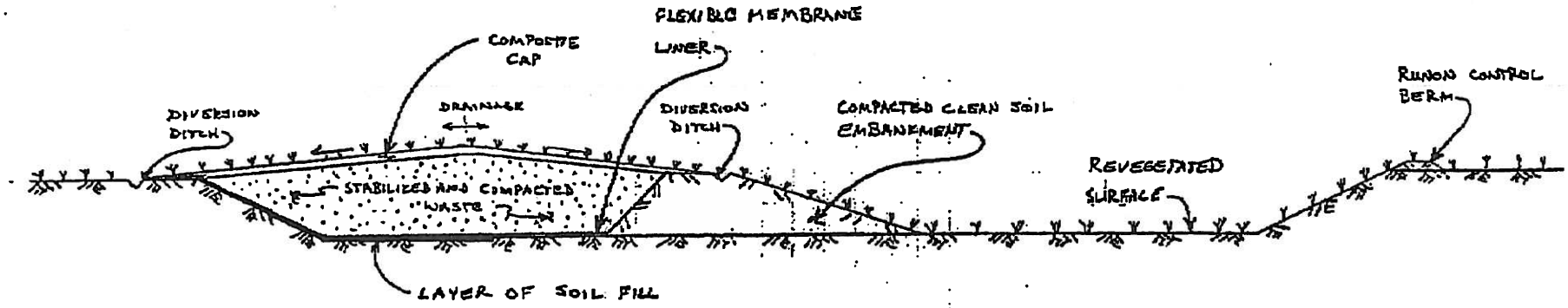
If additional public comment was required, such as if a CAMU designation was employed, the added time component could serve to put cap construction installation activities into periods typically associated with heavy rainfall. This could make cap construction difficult in light of the impacts of moisture on characteristics of capping soils and the geotechnical QA/QC requirements.

Randall appreciates your consideration of the proposed modification and looks forward to receiving your response. If it would be appropriate, we would be glad to meet with you to resolve potential regulatory issues or technical issues that may be raised by this proposal. If you have any questions, please give me a call at (513) 896-3834.

Sincerely,

Mark Williams
Randall Textron

MW:kp
BLB



IMPOUNDMENT PROFILE
(NOT TO SCALE)

FIGURE 1
RANDALL TEXTRON
GRENADA, MISSISSIPPI

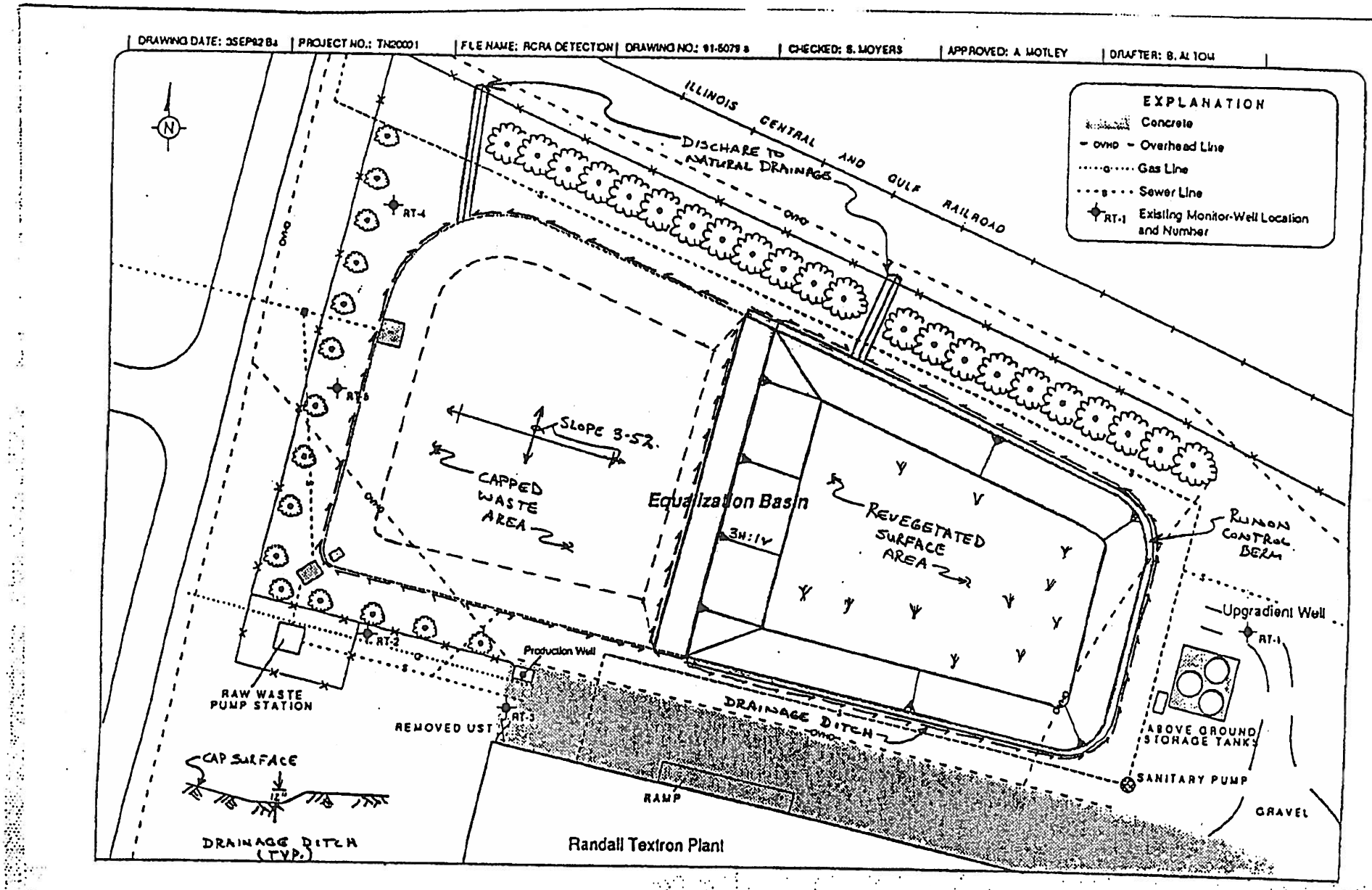


FIGURE 2
RANDALL TEXTRON
GRENADA, MISSISSIPPI

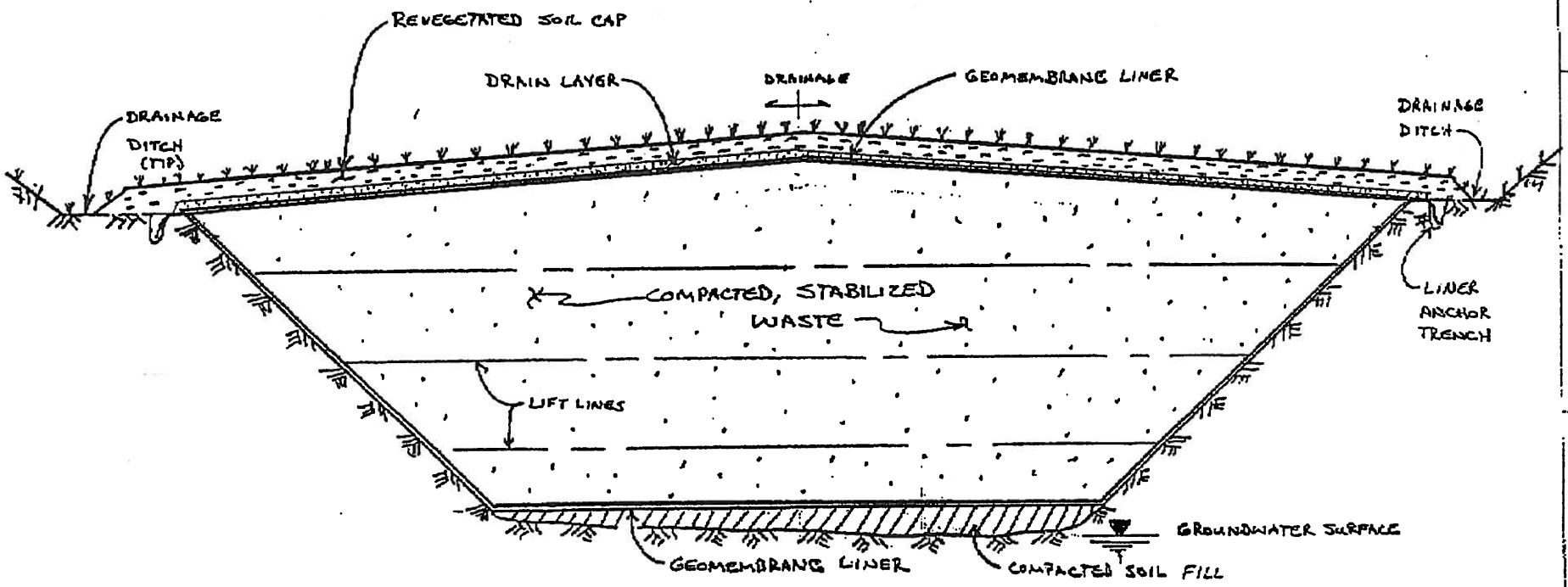


FIGURE 3
RANDALL TEXTRON
GRENADA, MISSISSIPPI

STATE OF MISSISSIPPI
DEPARTMENT OF ENVIRONMENTAL QUALITY
JAMES I. PALMER, JR.
EXECUTIVE DIRECTOR

July 21, 1993

CERTIFIED MAIL NO. P 167 722 208
Mr. Mark Williams
Randall Textron
10179 Commerce Park Drive
Cincinnati, Ohio 45246

Re: June 9, 1993 - Request for Modification
Equalization Lagoon Closure Plan
Randall-Textron - Grenada, MS

Dear Mr. Williams:

In response to the above request, the Mississippi Office of Pollution Control (Office) has the following comments:

1) The State of Mississippi does not have the authority to implement the Corrective Action Management Unit (CAMU) rule. The Office does not object to using this approach at the facility, however, EPA Region IV would have to regulate the use of the CAMU rule at the site.

2) The Office has no objection to the use of quicklime as long as the requirements of MHWMR 264.228 are met.

3) The Office has no objection to the creation of a waste cell within the regulated unit. Specific construction details and QA/QC protocol should be included with the Closure Plan modification request. The Office does not view the movement of soils within the physical boundaries of the unit as placement.

4) A sampling plan for the uncapped portion of the unit should be included as part of the Closure Plan modification. This portion of the unit will essentially have to meet the requirements of a clean closure for the soils. A copy of "Guidance for Preparing Clean Closure Equivalency Demonstrations" is enclosed. Also enclosed is a table of health based criteria for various constituents as calculated using the method in section 8 of the RCRA Facility Investigation Guidance.

5) The modified Closure Plan will have to be placed on public notice as required by MHWMR 265.112(d)(4).

Should Randall-Textron wish to proceed with the modification to the Closure Plan, the modification should be submitted to the Office within 30 days of receiving this letter. If Randall-Textron does not wish to modify the Closure Plan, the Office approves the Closure Plan according to the conditional approval letter which was received by you on March 4, 1993.

Sincerely,

Bruce Ferguson
Hazardous Waste Division

Enclosures